

670-1

7/22/2009

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460



United States
Environmental Protection
Agency

Office of Pesticide Programs

Mrs. Karen E. Warkentien,
Lewis & Harrison
(Agent for Sunburst Chemicals, Inc.)
122 C. Street, N.W., Suite 740
Washington, D.C. 20001

JUL 22 2009

Subject: Product Name: Sentry
EPA Reg. No.: 670-1
Notification Date: June 25, 2009
EPA Receipt Date: June 26, 2009

Dear Mrs. Warkentien,

This letter acknowledges receipt of your notification submitted under the provision of the Federal Insecticide, Fungicide and Rodenticide Act. (FIFRA) section 3(c)9 and PR Notice 98-10.

Proposed Notification

- **Application for Pesticide Notification, Addition of Container Disposal Language per PRN 2007-4**

General Comments

Based on a review of the submitted materials, your application for pesticide notification of the product "Sentry", EPA Reg. No. 670-1 is acceptable. A copy has been placed in our records for future reference.

Please note, this correspondence supersedes the letter sent to you dated July 16, 2009. Should you have any questions or comments concerning this letter, please contact Velma Noble PM team 31 at (703) 308-6233 or Jamil Mixon at (703) 308-8032.

Sincerely,

Velma Noble,
Product Manager, Team 31

Regulatory Management Branch
Antimicrobials Division (7510P)

| CONCURRENCES | | | | | | | |
|--------------|--|--|--|--|--|--|--|
| SYMBOL | | | | | | | |
| SURNAME | | | | | | | |
| DATE | | | | | | | |

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United States
Environmental Protection Agency
 Washington, DC 20460

Registration
 Amendment
 Other

OPP Identifier Number

Application for Pesticide - Section I

| | | |
|---|---|--|
| 1. Company/Product Number 670-1 | 2. EPA Product Manager Velma Noble | 3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted |
| 4. Company/Product (Name) Sentry | PM# 31 | |
| 5. Name and Address of Applicant (Include ZIP Code) Sunburst Chemicals Inc. 220 West 86th Street Minneapolis MN 55420 <input type="checkbox"/> Check if this is a new address | 6. Expedited Review. In accordance with FIFRA Section 3(c)(3)(b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. _____ Product Name _____ | |

Section - II

Amendment - Explain below. Final printed labels in response to Agency letter dated _____

Resubmission in response to Agency letter dated 5/27/2009 "Me Too" Application.

Notification - Explain below. Other - Explain below.

Explanation: Use additional page(s) if necessary. (For section I and Section II.)

Notification of Label Change per PR Notice 2007-4: This notification is consistent with the guidance in PR Notice 2007-4 and the requirements of EPA's regulations at 40 CFR §§ 156.10, 156.140, 156.144, 156.146, and 156.156. No other changes have been made to the labeling or the Confidential Statement of Formula for this product. I understand that it is a violation of 18 USC § 1001 to willfully make any false statement to EPA. I further understand that if the amended label is not consistent with the requirements of 40 CFR §§ 156.10, 156.140, 156.144, 156.146, and 156.156, this product may be in violation of FIFRA and I may be subject to enforcement action and penalties under sections 12 and 14 of FIFRA.

Section - III

1. Material This Product Will Be Packaged In:

| | | | |
|--|---|--|--|
| Child-Resistant Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No | Unit Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No | Water Soluble Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No | 2. Type of Container <input type="checkbox"/> Metal <input type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input type="checkbox"/> Other (Specify) _____ |
| * Certification must be submitted | | If "Yes" Unit Packaging wgt. No. per container | If "Yes" Package wgt No. per container |

3. Location of Net Contents Information
 Label Container

4. Size(s) Retail Container

5. Location of Label Directions

6. Manner in Which Label is Affixed to Product
 Lithograph Paper glued Stenciled Other _____

Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)

| | | |
|-----------------------------|--|---|
| Name Karen E. Warkentien | Title Consultant to Sunburst Chemicals Inc. | Telephone No. (include Area Code) (202) 393-3903 x22 |
|-----------------------------|--|---|

Certification
 I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.

2. Signature

3. Title
Consultant to Sunburst Chemicals Inc.

4. Typed Name
Karen E. Warkentien

5. Date
25 June 2009

6. Date Application Received (Stamped)

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LEWIS & HARRISON

122 C Street, N.W., Suite 740
Washington, D.C. 20001

telephone 202.393.3903
fax 202.393.3906

Consultants in Government Affairs

25 June 2009

Via Hand Delivery

Ms. Velma Noble, PM #31
Regulatory Management Branch I
Antimicrobials Division (7510P)
Office of Pesticide Programs
US Environmental Protection Agency
One Potomac Yard
2777 Crystal Drive
Arlington VA 22202

**SUBJECT: Sentry, EPA Reg. No. 670-1
Application for Pesticide Notification
Addition of Container Disposal Language per PRN 2007-4
Response to Your Letter Dated 27 May 2009**

Dear Ms. Noble:

On behalf of our client, Sunburst Chemicals Inc. (Sunburst), Lewis & Harrison, LLC, submits herewith the following documents in support of amended registration for Sentry, EPA Reg. No. 670-1:

Volume I: Administrative Materials

- Application for Pesticide Notification (EPA Form 8570-1)
- Draft label (two copies, one with highlighted changes)

This resubmission is made in response to PR Notice 2007-4 and your letter dated 27 May 2009. A copy of your letter is enclosed.

Notification of Label Change per PR Notice 2007-4

This notification is consistent with the guidance in PR Notice 2007-4 and the requirements of EPA's regulations at 40 CFR §§ 156.10, 156.140, 156.144, 156.146, and 156.156. No other changes have been made to the labeling or the Confidential Statement of Formula for this product. I understand that it is a violation of 18 USC § 1001 to willfully make any false statement to EPA. I further understand that if the amended label is not consistent with the requirements of 40 CFR §§ 156.10, 156.140, 156.144, 156.146, and 156.156, this product may be in violation of FIFRA and I may be subject to enforcement action and penalties under sections 12 and 14 of FIFRA.

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Ms. Velma Noble, PM #31

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This submission is NOT subject to processing under the Pesticide Registration Improvement Act (PRIA) and should be categorized as a notification.

Should you have any questions concerning this submission, please contact me by phone at (202) 393-3903 x22 or via email at kwarkentien@lewisharrison.com.

Sincerely,

LEWIS & HARRISON, LLC
Consultant to Sunburst Chemicals Inc.

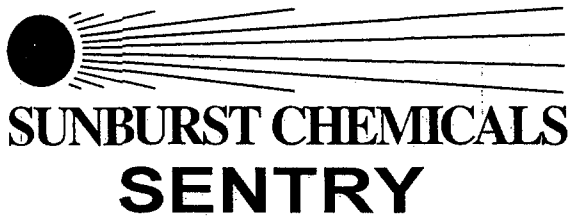


Karen E. Warkentien

Enclosures

cc: Bill Scepaniski, Sunburst

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| | |
|--|----------------|
| ACTIVE INGREDIENTS | |
| n-Alkyl (60% C_{14} , 30% C_{16} , 5% C_{12} , 5% C_{18}) dimethyl benzyl ammonium chlorides..... | 20.00% |
| n-Alkyl (68% C_{12} , 32% C_{14}) dimethyl ethylbenzyl ammonium chlorides..... | 20.00% |
| INERT INGREDIENTS | 60.00% |
| TOTAL | 100.00% |

KEEP OUT OF REACH OF CHILDREN

DANGER

See side panels for additional precautionary statements.

FIRST AID

Have product container with you when calling a poison control center or doctor, or going for treatment.

IF IN EYES: Hold eye open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses, if present, after 5 minutes. Then continue rinsing eye. Call a poison control center or doctor for treatment advice.

IF ON SKIN OR CLOTHING: Take off contaminated clothing. Rinse skin immediately with plenty of water for 15-20 minutes. Call a poison control center or doctor for treatment advice.

IF SWALLOWED: Call a Poison Control Center or Doctor immediately for treatment advice. Have person sip a glass of water if able to swallow. Do not induce vomiting unless told to do so by the poison control center or doctor. Do not give anything by mouth to an unconscious person.

NOTE TO PHYSICIAN: Probable mucosal damage may contraindicate the use of gastric lavage.

EPA Reg. No. 670-1
Lot #

EPA Est. No. 670-MN-01
NET CONTENTS: 3 lbs.

STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage, disposal or cleaning of equipment.

STORAGE: Store this product in a dry place no higher in temperature than 120 degrees F.

PESTICIDE DISPOSAL: Pesticide wastes are acutely hazardous. Improper disposal of excess pesticide, spray mixture or rinsate is a violation of Federal Law. If these wastes cannot be disposed of by use according to label instructions, contact your State Pesticide or Environmental Control Agency or the Hazardous Waste representative of the nearest EPA Regional Office for guidance.

CONTAINER DISPOSAL: Nonrefillable Container. Do not refill or reuse this container. Triple rinse as follows: Fill container 1/4 full with water and recap. Shake for 10 seconds. Follow Pesticide Disposal instructions for rinsate disposal. Drain for 10 seconds after the flow begins to drip. Repeat procedure two more times. Then offer for recycling or reconditioning. If not available, puncture and dispose in a sanitary landfill.

| |
|---|
| <p>PRECAUTIONARY STATEMENTS HAZARDS TO HUMANS AND DOMESTIC ANIMALS. DANGER</p> <p>Corrosive: Causes irreversible eye damage and skin burns. Do not get in eyes, on skin, or on clothing. Wear protective eyewear (safety glasses, goggles or face shield), rubber gloves, and protective clothing when handling. May be fatal if swallowed. Harmful if absorbed through the skin. Wash thoroughly with soap and water after handling and before eating, drinking, or using tobacco. Remove contaminated clothing and wash before reuse.</p> |
|---|

FOR CHEMICAL SPILL DIAL TOLL FREE
1-800-424-9300

FOR MEDICAL EMERGENCY INFORMATION
DIAL 1-866-303-6943

ESL042709 REV062609

NOTIFICATION

Date Reviewed: 7/15/05
Reviewed By: MJA

DIRECTIONS FOR USE

It is a violation of Federal Law to use this product in a manner inconsistent with its labeling. SENTRY is designed specifically for restaurants, bars, food processing plants and other food handling institutions where sanitization of food contact surfaces is of prime importance. SENTRY will sanitize previously cleaned and rinsed, hard non-porous food contact surfaces such as tanks, counter tops and food processing equipment at the recommended concentration of 200-400 ppm. SENTRY will sanitize previously cleaned and rinsed, hard non-porous food contact surfaces such as drinking glasses and eating utensils when used at the recommended concentration of 200 ppm. SENTRY is effective against *Escherichia coli*, *Listeria monocytogenes*, and *Staphylococcus aureus*.

SANITIZATION: Remove gross food particles and soil from all surfaces by rinsing, scraping or soaking. Wash and rinse surfaces with a good detergent and rinse with potable water before sanitizing. To sanitize the food contact surfaces, prepare a 200-400 ppm active quaternary solution. Follow sanitization instructions for specific use site below.

FOOD PROCESSING PLANTS AND OTHER FOOD HANDLING INSTITUTIONS:

To sanitize immobile items such as tanks, chopping blocks, counter tops and food processing equipment, prepare a 200-400 ppm active quaternary solution by placing the open jug of Sentry upside down in the dispenser. Turn on water flow to the dispenser, directing the hose at the bottom of the dispenser to the sink, pail, hand pump trigger sprayer or the surface to be sanitized. Test the active quaternary concentration coming out of the dispenser with the test strips provided in each case of Sentry. If below 200 ppm, add concentrate and retest. If above 400 ppm, add water and retest. Apply sufficient product by hand pump trigger sprayer, sponge, mop, cloth or by hosing down surfaces out of the dispenser outlet hose to flood the area with 200-400 ppm active quaternary solution for at least one (1) minute, making sure to wet all surfaces completely. If applied by spraying, use a coarse spray. Drain the use solution from the surface and air dry. Do not rinse surfaces with water after treatment. Prepare a fresh solution at least daily or more frequently if solution becomes diluted or soiled.

Manufactured by:
SUNBURST CHEMICALS, INC.
220 W 86TH ST. MINNEAPOLIS, MN 55420
(952) 884-3144

RESTAURANTS AND BARS:

To sanitize mobile items such as drinking glasses, dishes and eating utensils, immerse in a 200 ppm active quaternary solution for at least one (1) minute making sure to immerse completely. To make this 200 ppm active solution, place the open Sentry jug upside down in the dispenser. Turn on water to the dispenser and fill the sink, pail or soak tank to the proper level. Test quaternary concentration using the test strips provided in the Sentry box. If below 200 ppm, add concentrate. If above 200 ppm, add water. Mix and retest until a concentration of 200 ppm active quaternary is realized. Remove immersed items, drain the solution from the surface and air dry. Do not rinse with water after treatment. Prepare a fresh solution at least daily or more frequently if solution becomes diluted or soiled. When used as directed, this product is an effective sanitizer when diluted in water up to 750 ppm hardness (as CaCO₃).

GENERAL INSTRUCTIONS FOR SANITIZING UTENSILS:

1. Scrape and prewash utensils and glasses whenever possible.
2. Wash with a good detergent or compatible cleaner.
3. Rinse with clean water.
4. Sanitize in a solution of 1 ounce to 16 gallons of water (200 ppm). Immerse all utensils for at least two minutes or for contact time specified by governing sanitary code.
5. Place sanitized utensils on a rack or drainboard to air dry.

NOTE: A clean potable water rinse following sanitization is not permitted under Section HSS 196.13 of the Wisconsin Administrative Code.

Approved under the regulation of the Wisconsin State Division of Health.

NJTSRN: 5100-5024

PA-Identification of specific ingredients is being withheld as a trade secret.

| | |
|----------------------------|----------|
| H HEALTH | 2 |
| F FLAMMABILITY | 0 |
| R REACTIVITY | 0 |
| PERSONAL PROTECTION | B |

